I am in opposition to RM-10353. As pointed out, the procedure would remove the FCC from the process of granting callsigns. It would promote ownership of the callsign as well. Furthermore, as the procedure currently stands, "In Memoriam" requests fall last--below "Relative" status. RM-10353 would effectively reverse this, and place the FCC in the unenviable task of administrating in family disputes..for example when a licensee leaves his call to a club rather than allowing the FCC to allow a close relative privledge to apply under the current licensing system.

The FCC has had a longstanding policy of fairness in the granting of callsigns. RM-10353 would effectively preempt FCC authority in this procedure.

Sincerely, Steven E. Matda, KE4MOB